

Application No. 10/063,094  
Amendment dated August 5, 2004  
Reply to Office Action of May 5, 2004

RD-27190-3

**REMARKS**

Applicants appreciate the consideration shown by the Office, as evidenced by the Office Action, mailed on May 5, 2004. Claims 24-35 and 37-40 were pending. In the Office Action, the Examiner rejected claims 24-35 and 37-40. Applicants have amended claims 24, 35, and 37. Applicants have canceled claims 29 and 38 for reasons unrelated to patentability over prior art. As such, claims 24-28, 30-35, 37, and 39-40 remain in the case with none of the claims being allowed.

The May 5, 2004, Office Action has been carefully considered. Applicants respectfully request reconsideration of the application by the Examiner in light of the above amendments and the following remarks.

**DEFINITENESS**

The Examiner rejected the claims 24-28, 30-35, 37, 39-40 as allegedly indefinite. In the independent claims, the Examiner alleged that the scope of the term "with a larger area" is unclear. Applicants have amended claims 24, 35, and 37 to add to the phrase with a larger area "than a single plasma source." Consequently, Applicants respectfully submit that claims 24-28, 30-35, 37, and 39-40 are not indefinite.

**NON-OBVIOUSNESS UNDER 35 U.S.C. §103(A)**

The examiner rejected claims 24-28, 30, 32-35, 37, and 39-40 under 35 U.S.C. §103(a) as allegedly unpatentable over EP 887110 in view of Ackermann et al. (U.S. Patent 5,062,508).

Applicants have amended independent claims 24, 35, and 37 to add to the phrase with a larger area "than a single plasma source." Applicants have also amended claims 24, 35, and 37 to add "comprise heating at least one portion of the substrate by a heating means other the plurality of expanding thermal plasma plumes." Heating at least one portion of the substrate by a heating means other the plurality of expanding thermal

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plasma plumes is supported by the specification in paragraphs 40-43 and is not new matter.

Regarding EP 887110, the Examiner even admitted that EP 887110 fails to disclose *multiple plasma sources*.

Regarding Ackerman, although Ackermann discloses a chemical vapor deposition, Ackerman fails to disclose coating *area* that is larger. The Examiner even admitted in both office actions that Ackerman merely discloses multiple plasma sources in *one direction* (horizontal/parallel), which only increase the *coating thickness*, not *area*, of a substrate. (11/4/2003 Office Action page 6). In other words, if a substrate passes through multiple plasma sources lined up horizontally/parallel, it is mathematically impossible for the coating *area* to increase; only the coating thickness can increase. For *area* to increase, multiple plasma sources in more than one direction are needed. In this case, the Examiner has not demonstrated a motivation to modify Ackerman to comprise multiple plasma sources in more than one direction and nor has the Examiner demonstrated a motivation for success.

Furthermore, Ackerman also fails to disclose heating at least one portion of the substrate by a heating means other the plurality of expanding thermal plasma plumes. In this case, the Examiner has not demonstrated a motivation to modify Ackerman to comprise heating at least one portion of the substrate by a heating means other the plurality of expanding thermal plasma plumes. Nor has the Examiner demonstrated a motivation for success.

Consequently, Applicants respectfully submit that claims 24-28, 30, 32-35, 37, and 39-40 are not obvious over EP 887110 in view of Ackerman.

The examiner rejected claims 24-28, 30, 32-35, 37-40 under 35 U.S.C. §103(a) as allegedly unpatentable over EP 887110 in view of Paquet (U.S. Patent 5,985,378).

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As mentioned earlier, Applicants have amended independent claims 24, 35, and 37 to add to the phrase with a larger area "than a single plasma source." Applicants have also amended claims 24, 35, and 37 to add "comprise heating at least one portion of the substrate by a heating means other the plurality of expanding thermal plasma plumes."

Regarding EP 887110, as mentioned earlier, the Examiner even admitted that EP 887110 fails to disclose *multiple plasma sources*. Regarding Paquet, Paquet fails to disclose heating at least one portion of the substrate by a heating means other the plurality of expanding thermal plasma plumes. In this case, the Examiner has not demonstrated a motivation to modify Paquet to comprise heating at least one portion of the substrate by a heating means other the plurality of expanding thermal plasma plumes. Nor has the Examiner demonstrated a motivation for success.

Consequently, Applicants respectfully submit that 24-28, 30, 32-35, 37, and 39-40 are not obvious over EP 887110 in view of Paquet.

In light of the amendment and remarks presented herein, Applicants submit that the remaining claims 24-28, 30-35, 37, and 39-40 are in a condition for immediate allowance and respectfully request such action. If, however, any issues remain unresolved, the Examiner is invited to telephone the Applicants' counsel at the number provided below.

Respectfully submitted,



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Date